

Message

From: Lesley Hay Wilson [lhay_wilson@sagerisk.com]
Sent: 11/20/2018 8:55:37 PM
To: Lesley Hay Wilson [lhay_wilson@sagerisk.com]
CC: Chapman, William [randy.chapman@deq.virginia.gov]; Patricia Reyes [preyes@ecos.org]; Richard Spiese [Richard.spiese@vermont.gov]; Tom Higgins [tom.higgins@state.mn.us]; Bob Mueller [bob.mueller@dep.nj.gov]; Virginia Yingling [virginia.yingling@state.mn.us]
Subject: Re: ITRC DRAFT PFAS TECHNICAL AND REGULATORY GUIDANCE DOCUMENT – REVIEW REQUEST

To: ITRC Federal Partners
cc: Randy Chapman, Patricia Reyes, Richard Spiese, Tom Higgins
From: Robert Mueller, NJ DEP; Virginia Yingling, MN Dept of Health
Date: November 20, 2018

The PFAS team has decided to **extend the review and comment period until January 25, 2019.**

The team has decided to extend the review for the PFAS Technical and Regulatory Guidance Document in order to request feedback on the following key issues. No decisions have been made; the team is requesting this feedback to inform ITRC's decision making. The ITRC Board has not approved any specific decisions about the PFAS document. We have received initial feedback from reviewers that the document is too long.

Key Issues:

- Should we break the document into 2 or more publications?
- Is the document too long? What should be pared down?
- If there isn't time to review all, please focus on topic areas.

The PFAS team understands that the document as submitted is lengthy and covers a broad range of topic areas. Because of the interest in and breadth of the topics that are needed for PFAS the team felt that all of the topics should be included. We understand that state regulatory personnel may be addressing different aspects of the PFAS issues, so we are considering dividing the materials to make them more accessible. While the document and additional supporting tables amount to more than the 300-page limit of the ITRC Style Manual, there are 4 extensive reference lists included in the total. The team intends to consolidate the lists into one master list for the web-based document. In addition, the team intends to review closely places in the text where multiple references might be pared down to a shorter list in order to streamline the text.

Consider 2 or more publications: It has been suggested that we should separate the document into 2 or more publications. As with all of the current ITRC documents, the PFAS team intends to publish their Tech Reg document as a web-based document. The separate documents, or volumes, could be linked on the web. The team requests feedback on the utility of separating the document into multiple web documents that are linked. As an example, the material that we have could be published as four volumes:

- Volume 1: History and Use, Naming Conventions, Sources, Regulations, Toxicity and Risk Assessment, and Stakeholder Perspectives.
- Volume 2: Physical Chemical Properties, Fate and Transport Process and Media-Specific Occurrence, Sampling and Analytical, Site Characterization and Treatment Technologies, including related case studies
- Volume 3: Firefighting foam
- Volume 4: Risk Communication, including related case studies.

The team requests feedback on the example volume groupings of topics, or other arrangements of topics.

Consider the length of the document: In a web-based document, users are able to search for the needed information. The chapters of the draft document are designed to have the overview information at the beginning and

using the “Read More” structures users can determine if the additional details are of interest. As part of the review, reviewers could answer:

- Is the document too long?
- What topics are not needed, or should be pared down?
- Is the introductory information for each chapter useful to orient the reader?

The team requests that the reviewers consider making suggestions about how we should prioritize topics to streamline or reduce the overall content of the document.

No decisions have been made; the team is requesting this feedback to inform ITRC’s decision making. The ITRC Board has not approved any specific decisions about the PFAS document.

Consider reviewing by topic areas: If possible, we would like to suggest that reviewers might chose to review subsections of the document by topic area. The Introduction to the document is brief and contains links to different topic areas in the document. Example topic areas are included here:

- Firefighting foam: Chapter 3
- Chemistry and naming conventions, PFAS sources, Regulatory programs, physical and chemical properties, fate and transport: Chapters 2, 4, 5 and 6, Sections 8.1, 8.2
- Treatment: Chapter 12 and Treatment case studies 15.2
- Toxicity and Risk Assessment, Risk Communication: Chapters 7, 8, 9 and 14
- Site Characterization, Sampling and Analytical: Chapters 10 and 11, and Site Characterization case studies 15.1
- Stakeholder Perspectives and Risk Communication: Chapters 13 and 14, Section 15.3

General project management reviewers might review: Introduction, Sections 2.1, 2.2, 2.2.1, 2.2.2 (to page 15), 2.3, 2.4, 2.6, 4.1, 5.1, Sections 8.1, 8.2, Chapter 10, Chapter 11 through 11.1.2; Section 11.2 through section 11.2.1.1, Section 12.1, Chapter 13, Chapter 14 (to page 331) and Section 15.3.

The team began working in June 2018 on a Risk Communication Toolkit of supporting materials beginning with a risk communication plan template. The team intends to make these materials available for external review in 2019. These will also be published as a web-based document and be linked to the Tech Reg document. In the Tech Reg document currently for Risk Communication we have Chapter 14 that discusses risk communication and one case study (Section 15.3). The Risk Communication writing subgroup has collected and is working on writing up additional risk communication case studies. All of the Risk Communication information could be collected into one separate web-based document that is linked to the Tech Reg document.

Thank you for your attention to this request. Please let us know if you have any questions.

Regards,

Bob Mueller, NJ DEP, PFAS Team Leader, bob.mueller@dep.nj.gov
Ginny Yingling, MN Dept. Of Health, PFAS Team Leader, virginia.yingling@state.mn.us
Lesley Hay Wilson, PFAS Program Advisor, lhay_wilson@sagerisk.com

Lesley Hay Wilson, Ph.D.
Sage Risk Solutions LLC
lhay_wilson@sagerisk.com
phone: 512-327-0902

Statement of Confidentiality:

The information contained in this electronic message and any attachments are intended for the exclusive use of the addressees and may contain confidential or privileged information. If you are not the intended recipient, please notify Lesley Hay Wilson immediately at (512) 327 - 0902 and destroy all copies of this message and any attachments.

From: Lesley Hay Wilson <lhay_wilson@sagerisk.com>
Date: Wednesday, October 24, 2018 at 5:32 PM
To: Lesley Hay Wilson <lhay_wilson@sagerisk.com>
Cc: "Chapman, William" <randy.chapman@deq.virginia.gov>, Patricia Reyes <preyes@ecos.org>, Richard Spiese <Richard.spiese@vermont.gov>, Tom Higgins <tom.higgins@state.mn.us>, Bob Mueller <bob.mueller@dep.nj.gov>, Virginia Yingling <virginia.yingling@state.mn.us>
Subject: ITRC DRAFT PFAS TECHNICAL AND REGULATORY GUIDANCE DOCUMENT – REVIEW REQUEST

To: ITRC Federal Partners
cc: Randy Chapman, Patricia Reyes, Richard Spiese, Tom Higgins
From: Robert Mueller, NJ DEP; Virginia Yingling, MN Dept of Health
Date: October 24, 2018

REQUEST SNAPSHOT:

DRAFT REVIEW/COMMENT: Technical and Regulatory Guidance Document Per- and Polyfluoroalkyl Substances (PFAS)

REVIEW/COMMENT PERIOD: October 24 – December 12, 2018

REVIEW/COMMENT REQUEST: The PFAS Team is offering a draft technical and regulatory guidance document (see link provided below) for your review and comment. Please focus your comments on the content, thoroughness, and usefulness of the documents, not on editorial comments. The documents will be going through a complete editorial review after comments are received and addressed. Please use this review opportunity to make sure this ITRC document meets your needs and requirements. In your comment submission please include any regulatory or related barriers to the routine use of the guidance document.

DOCUMENT INTENT/GOAL: ITRC has already published seven PFAS fact sheets. The published fact sheets can be accessed at this web site <https://pfas-1.itrcweb.org>.

The technical and regulatory guidance document is tailored to the needs of state regulatory program personnel who are tasked with making informed and timely decisions regarding PFAS-impacted sites. The content is also useful to consultants and parties responsible for the release of these contaminants, as well as public and tribal stakeholders. The technical and regulatory guidance document will be published as a web-based document.

KEY ISSUES FOR CONSIDERATION DURING REVIEW:

- Is the information at level that is useful to your staff? Is it too basic? Too detailed?
- Are enough details, references and links to other resources provided so that the document will be useful to your staff?
- Are you aware of other information for PFAS that should be included?
- If you have information about case studies that could be included in the final document, please contact the team leaders.

PROGRAMS/STAFF TO TARGET FOR REVIEW:

- Staff who are involved in site investigation and cleanup at contaminated sites, such as RCRA, Superfund (State or Federal), and Voluntary Cleanup Programs.
- Staff who are involved in environmental, health, safety, and emergency response roles.
- Staff who are involved in drinking water and water treatment programs.

- Staff who interact with or provide support to AFFF users at municipalities, airports and industrial facilities.

DOWNLOAD THE GUIDANCE DOCUMENT AT:

The document and supplemental materials are provided as a zipped file through a link on the ITRC web site. The team requests that you provide your comments in the comments spreadsheet. Please also provide your comments on any of the extra tables in the comments spreadsheet. Do not mark-up the PDF of the document, or the Excel or PDF versions of the tables.

Please contact Lesley Hay Wilson if you have any difficulties with the review files.

- PFAS Technical and Regulatory Guidance Document Review Zip link:
<https://www.itrcweb.org/FileCabinet/GetFile?fileID=14565>
- The zipped file includes
 - PFAS Technical and Regulatory Guidance Document (PDF)
 - PFAS TablePhysChemPropertiesTable4-1(Excel)
 - PFAS Table 5-1 BCF, BAF, BMF – Biota (Excel)
 - PFAS Table 5-2 BCF, BAF, BMF – Plant (Excel)
 - PFAS Section 7.2 Table ecotoxicology data summary (Excel)
 - PFAS Tech Reg Treatment Tables (PDF)
 - PFAS Tech Reg Water Treatment Case Study Summary Table (Excel)
 - PFAS Table 14-2 EduMaterials (PDF)
 - Comments collector spreadsheet (Excel)

SEND COMMENTS SPREADSHEETS BY 12/12/18 TO:

- Bob Mueller at bob.mueller@dep.nj.gov, 609-984-3910
- Ginny Yingling at virginia.yingling@state.mn.us, 651-201-4930
- Lesley Hay Wilson, Program Advisor, at lhay_wilson@sagerisk.com, (512) 327-0902

Thank you in advance for your attention to this request. This is your opportunity to provide review and comment on this document before it is finalized. Please let us know how we can improve the document to make it more usable.

Regards,
Lesley Hay Wilson

Lesley Hay Wilson, Ph.D.
Sage Risk Solutions LLC
lhay_wilson@sagerisk.com
phone: 512-327-0902

Statement of Confidentiality:

The information contained in this electronic message and any attachments are intended for the exclusive use of the addressees and may contain confidential or privileged information. If you are not the intended recipient, please notify Lesley Hay Wilson immediately at (512) 327 - 0902 and destroy all copies of this message and any attachments.